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April 23, 2023

VIA ECF

Honorable Robert B. Kugler United States District Court Mitchell H. Cohen Building and U.S. Courthouse 4th and Cooper Streets Camden, New Jersey 08101

> Re: In re Valsartan, Losartan, and Irbesartan Liability Litigation, Case No. 1:19-md-02875-RBK (D.N.J.)

Dear Judge Kugler:

I am writing to confirm the discussion during today's conference regarding certain deadlines moving forward.

Defendants' motion to stay pending their Rule 23(f) motion to be filed by February 27, 2023.

Plaintiffs' response to the motion to stay to be filed by March 13, 2023.

Hearing on the motion to stay on March 29, 2023 at 1 pm in Court.

Daubert briefs on liability experts, currently due on February 27, 2023, now due on March 13, 2023.

Responsive Daubert briefs on liability experts, now due on April 3, 2023.

Reply Daubert briefs on liability experts, now due April 17, 2023.

The deadlines for the defense damage expert reports, and for the filing of dispositive

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motions are held in abeyance pending the March 29, 2023 hearing in Court.

The April 26, 2023 in Court meeting remains on the schedule and will go forward.

Thank you for your courtesies and consideration.

Respectfully,

ADAM M. SLATER

cc: All Counsel (via ECF)